

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., <i>et al.</i> ,	:	Case No. 2:23-cv-00512-SDM-CMV
	:	
Plaintiffs,	:	Judge Sarah D. Morrison
	:	Magistrate Judge Chelsey M. Vascura
v.	:	
	:	
BRINSON CALEB SILVER, <i>et al.</i> ,	:	DECLARATION OF DEFENDANT
	:	QUANTASY & ASSOCIATES, LLC
Defendants.	:	
	:	
	:	
	:	

I, William Campbell, hereby declare under penalty of perjury that the following are true and correct to the best of my knowledge and belief:

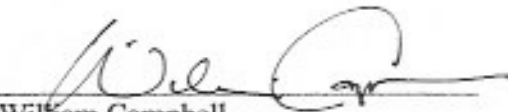
1. I am over the age of 18 and reside in California.
2. I am the Chief Executive Officer of Quantasy & Associates LLC ("Quantasy").
3. Quantasy does not transact business in the State of Ohio and it is not registered to do business in the State of Ohio. Quantasy has never had a location in the State of Ohio.
4. Quantasy is located in the State of California and registered to do business in the State of California. Quantasy is organized under the laws of the State of Delaware.
5. Quantasy does not market or advertise its services in the State of Ohio, and Quantasy does not solicit business in the State of Ohio.
6. Quantasy did not solicit business from plaintiffs Root, Inc., Caret Holdings, Inc. and Root Insurance Agency, LLC (collectively, "Plaintiffs" or "Root").
7. Brinson Silver ("Silver") contacted me in my capacity as the CEO of Quantasy in or about

November 2022 regarding Quantasy serving as a marketing vendor for Silver's new employer.

8. Quantasy ultimately signed several statements of work, change orders, or agreements related to this matter. One agreement was with Collateral Damage LLC and the other were with Root Insurance Agency, LLC ("Root"). All of these agreements were negotiated only with Silver through live discussions, text messages, WhatsApp, and email.
9. Other than Silver, no one from Root was involved in the negotiations of these agreements with Quantasy. All substantive communications regarding Quantasy's return of the \$1.2 million were with Silver without involvement of any other representatives of Plaintiffs; however, Quantasy did confirm with Root's CFO that it would return the \$1.2 million to Root. At all times during the course of these negotiations and their business dealings, Quantasy believed and understood that Silver was located in California and resided in California.
10. Quantasy representatives met with Root representatives (other than Silver) on a handful of occasions, each time by telephone or video conference. No Quantasy representatives traveled to Ohio to meet with any of the plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/11, 2023


William Campbell
Chief Executive Officer, Quantasy & Associates